

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NELSON L. BRUCE,  
Plaintiff,

CASE NO.: 2:21-cv-03603-BHH-MGB

v.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC., TRANS UNION, LLC,  
and UNKNOWN DOES 1-100,  
Defendants.

**DEFENDANTS EXPERIAN INFORMATION SOLUTIONS, INC., AND TRANS  
UNION, LLC’S RESPONSE TO PLAINTIFF’S SUPPLEMENTAL COMPLAINT**

COMES NOW, Experian Information Solutions, Inc. (“Experian”), and Trans Union, LLC (“TransUnion”), in the above-referenced action, and would respectfully show the Court as follows:

1. On March 22, 2022, Plaintiff filed his Supplemental Verified Complaint. [ECF No. 41].

2. Plaintiff’s Supplemental Verified Complaint has failed to cure the deficiencies as outlined in Experian’s and Trans Union’s Joint Motion for More Definite Statement [ECF No. 26]. Experian and Trans Union hereby incorporate by reference their Joint Motion for More Definite Statement in response to Plaintiff’s Verified Complaint.

3. For the reasons set forth in the Joint Motion for More Definite Statement, Plaintiff’s Complaint remains ambiguous and vague and does not meet the basic pleading requirements under Fed. R. Civ. P. 8. Trans Union and Experian cannot frame a responsive pleading without making assumptions about Plaintiff’s allegations, and Trans Union and Experian are not required to make assumptions. As Defendants, Trans Union and Experian are expected to respond to the pleadings in short and plain terms, asserting defenses and admitting or denying the averments upon which

the opposing party relies. Fed. R. Civ. P. 8(b). As it stands, the Complaint does not provide allegations sufficiently definite to determine which claims Plaintiff actually intends to assert (particularly as to the FCRA language in the Complaint) or the facts upon which the claims are premised, and more importantly, does not provide Trans Union and Experian with the ability to properly state any defenses and comply with its obligations under Rule 8(b).

4. Defendant Trans Union and Experian respectfully request pursuant to Fed. R. Civ. P. 12(e) that this Honorable Court direct Plaintiff to further provide a more definite statement, within fourteen days after Notice of the Order, to strike Plaintiff's pleadings if he does not comply with the Order, and for such other relief as the Court deems necessary.

Respectfully submitted,

CLEMENT RIVERS, LLP

*s/ Wilbur E. Johnson*

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Wilbur E. Johnson Federal ID No.: 2212

[wjohnson@ycrlaw.com](mailto:wjohnson@ycrlaw.com)

25 Calhoun Street, Suite 400

Charleston, SC 29401

(843) 724-6659

(843) 579-1332 Fax

***Counsel for Trans Union LLC***

ADAMS AND REESE LLP

Lyndey Ritz Zwing Bryant, Federal ID No.: 11506

[lyndey.bryant@arlaw.com](mailto:lyndey.bryant@arlaw.com)

1501 Main Street, Fifth Floor

Columbia, SC 29201

(803) 212-4958

(803) 779-4749 Fax

***Counsel for Experian Information Solutions, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

Rita Bolt Barker  
[rbarker@wyche.com](mailto:rbarker@wyche.com)  
Wyche PA  
200 E Camperdown Way  
Greenville, SC 29601  
(864) 242-8235  
***Counsel for Equifax Information Solutions,  
LLC***

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce  
PO BOX 3345  
Summerville, SC 29484-3345  
***Pro Se Plaintiff***

s/ Wilbur E. Johnson

**WILBUR E. JOHNSON**